

# LEE LITIGATION GROUP, PLLC

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July 6, 2021

**MEMO ENDORSED**

**Via ECF**

Honorable Katherine Polk Failla U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York, 10007

Re: *Salmeron v. 20E Frame Inc. d/b/a ETC Eatery et al*  
Case No. 20-cv-01813 (KHP)

Dear Judge Failla,

We are counsel for Plaintiff in the above-referenced action. We write, jointly with counsel for Defendants, to inform the Court that the parties have met and conferred regarding settlement. Parties were unable to settle the matter on our own, and parties have agreed to engage a private mediator, Mr. Martin Scheinman, at a significant cost, to assist in settlement discussions. Parties contacted Mr. Scheinman on July 2, 2021, for his best availability to conduct a mediation between all parties.

As the parties have agreed to mediate, they jointly request a continued stay of discovery and all other deadlines, as set forth in the Court's June 21, 2021 Order for a period of (4) four months (Doc. 58). In addition, Plaintiff's Motion for Conditional Certification will be held in abeyance pending the mediation (Doc. 53). Since Mr. Scheinman is a nationally recognized mediator/arbitrator with a Conflict Resolution Institute named after him at Cornell University, his schedule is immensely busy; but the parties hope to obtain the best and earliest available date.

By October 31, 2021, the parties will provide a status update informing the Court if the parties were able to settle or, if unable to settle, the parties will provide a Joint Discovery Schedule including a briefing schedule of Plaintiff's Collective Motion.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ C.K. Lee  
C.K. Lee, Esq.

Cc: all parties via ECF

Application GRANTED. All discovery and briefing deadlines are adjourned pending further order of the Court. The parties shall file a status update on or before **October 31, 2021**.

Dated: July 7, 2021  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE